

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

----- X

LORRAINE SAPP

Plaintiff,

-against-

PREMIER EDUCATION GROUP, LP d/b/a
HARRIS SCHOOL OF BUSINESS,
SHARMONE WOODS, LORI BILDER, and
HARRIS SCHOOL OF BUSINESS STAFF 1-
50,

Defendants.

----- X

NOTICE OF MOTION

15-CV-08591 (RMB)(AMD)

MOTION DAY:

April 4, 2016

**ORAL ARGUMENT IS
REQUESTED**

PLEASE TAKE NOTICE that defendants Premier Education Group, LP d/b/a Harris School of Business, Sharmone Woods (“Woods”), and Lori Bilder (“Bilder”) (collectively, “Defendants”) shall move this Court before the Honorable Renée Marie Bumb, United States District Court Judge, at the courthouse located at the Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Camden, New Jersey 08101, courtroom 3D on **April 4, 2016** for an Order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure (the “Order”).

PLEASE TAKE FURTHER NOTICE that Defendants seek an Order dismissing: (i) the Section 504 of the Rehabilitation Act of 1973 claim (“Count I”) against defendants Woods and Bilder; (ii) the Title III of the Americans with Disabilities Act claim (“Count II”) against defendants Woods and Bilder; (iii) the

Equal Protection under the United States Constitution pursuant to 42 U.S.C. Section 1983 claim (“Count III”) against all Defendants; (iv) the substantive Due Process under the United States Constitution claim (“Count IV”) against all Defendants; (v) the Equal Protection under the New Jersey state Constitution pursuant to the New Jersey Civil Rights Act claim (“Count VI”) against all Defendants; (vi) the substantive Due Process under the New Jersey state Constitution claim (“Count VII”) against all Defendants; (vii) the breach of contract claim (“Count VIII”) against all Defendants; and (viii) the New Jersey Consumer Fraud Act claim (“Count IX”) against all Defendants.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Local Civil and Criminal Rules of the United States District Court for the District of New Jersey, rules 7.1(d)(2) and 7.1(d)(3), Plaintiff’s brief and papers in opposition (if any) are due at least 14 days prior to the motion day date elucidated herein, and Defendants’ papers in reply and reply brief (if any) are due at least 7 days prior to same.

PLEASE TAKE FURTHER NOTICE that Defendants will rely on the attached Certification Kevin C. Donovan, Esq. dated March 1, 2016, the brief, and the documents annexed thereto.

Dated: Florham Park, New Jersey
March 1, 2016

By: 

**WILSON ELSER MOSKOWITS
EDELMAN & DICKER LLP**

Kevin C. Donovan, Esq.
200 Campus Drive
Florham Park, NJ 07932
(973) 735-5760

**MELTZER, LIPPE, GOLDSTEIN &
BREITSTONE, LLP**

Larry R. Martinez, Esq.
Christopher P. Hampton, Esq.
190 Willis Avenue
Mineola, New York 11501
(516) 747-0300
Attorneys for Defendants

To: **KOBER LAW FIRM, LLC** (via ECF)
Peter Kober, Esq.
1876 Greentree Rd
Cherry Hill, New Jersey 08003
(856) 761-5090
Attorneys for Plaintiff